

JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney

BRIAN J. STRETCH (CSBN 163973)  
Chief, Criminal Division

NICOLE KIM (NYBN 4435806)  
Assistant United States Attorney

450 Golden Gate Ave.  
San Francisco, California 94102  
Telephone: (415) 436-6401  
Fax: (415) 436-6982  
E-Mail: nicole.kim@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) No. CR 08-0083 PJH

v. )

GUILLERMO ALEJANDRO )  
ZARAGOZA, et al; )

Defendants. )

UNITED STATES OF AMERICA, ) No. CR 08-0143 PJH

v. )

FRANCISCO MORA ALVAREZ, )

Defendant. )

[PROPOSED] ORDER EXCLUDING  
TIME FROM SPEEDY TRIAL ACT  
COMPUTATION

The parties appeared before the Court on May 21, 2008 at 1:30 p.m for a status  
conference. Defendant Guillermo Zaragoza appeared in custody with his attorney George

Speedy Trial Act Order

U.S. v. Guillermo Zaragoza, et. al (08-0083 PJH)

U.S. v. Francisco Mora Alvarez (08-0143 PJH)

1   Cotsirilos; defendant Manuel Corona appeared in custody with attorney Nina Wilder; defendant  
2   Irma Corona appeared in custody with her attorney Garrick Lew; defendant Paul Kozina  
3   appeared with his attorney Christy O'Connor; defendant David Quezada in custody appeared  
4   with his attorney Steve Teich; defendant Angelica Rodriguez appeared in custody with her  
5   attorney Seth Chazin; defendant Martel Valencia appeared in custody with attorney Steve Teich,  
6   who appeared specially for attorney Robert Waggener; defendant Eduardo Zaragoza appeared in  
7   custody with his attorney Claire Leary; defendant Martin Zaragoza appeared in custody with his  
8   attorney Gail Shiffman; defendant Richard Parodi appeared in custody with attorney Doug  
9   Rappaport; defendant Juan Zaragoza appeared with his attorney Roger Patton; and defendant  
10   Lorenzo Carbajal appeared in custody with his attorney Ismail Ramsey. Defendant David Weld  
11   was not present and his appearance was waived by his attorney Brian Berson; defendant Roberto  
12   Ruiz remains at-large; and defendant Francisco Mora Alvarez, in the related case 08-0143 PJH,  
13   appeared with his attorney Haywood Gilliam.

14         At the May 21, 2008 status conference, the parties requested a continuance until July 23,  
15   2008 at 1:00 p.m. Discovery has been on-going since the commencement of this case.  
16   Discovery has included, among other things, wiretap materials, including audio calls and line  
17   sheets from the wire interceptions, surveillance videos and photographs, and search warrant  
18   materials. Counsel for the defense stated that they need additional time to review the discovery.  
19   The parties agreed in open Court, with their attorney's concurrence, that the case should be  
20   declared factually complex. Accordingly, the parties agreed, that the entire period from May 21,  
21   2008 through and including July 23, 2008 should be excluded from the otherwise applicable  
22   Speedy Trial Act computation, because the factual complexity renders it unreasonable to expect  
23   adequate and effective preparation for pretrial proceedings and for the trial within the otherwise  
24   applicable time limits set forth in the Speedy Trial Act.

25         Based upon the above-described representations and the parties' agreement in open  
26   Court, the Court FINDS THAT the ends of justice served by granting a continuance from the  
27   inception of this case through and including July 23, 2008 outweigh the best interest of the public  
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1 and the defendants in a speedy trial, and that the case is so factually complex, due to the number  
2 of defendants and the nature of the prosecution, that it is unreasonable to expect effective and  
3 adequate preparation for pretrial proceedings and for the trial within the otherwise applicable  
4 time limits set forth in the Speedy Trial Act, within the meaning of 18 U.S.C. § 3161(h)(8)(A)  
5 and (B)(ii) and (iv).

6 Accordingly, the Court ORDERS THAT:

7 1. This case is continued to July 23, 2008 at 1:00 p.m. for further status and for  
8 possible setting of motions and trial dates.

9 2. The period from May 21, 2008 through and including July 23, 2008 is  
10 excluded from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. §  
11 3161(h)(8)(A) and (B)(ii) and (iv).

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13  
14 Dated: May \_\_, 2008

HON. PHYLLIS J. HAMILTON  
United States District Judge